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Attorneys for Defendants

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

1. On October 2, 2025, the Court approved the parties' stipulation staying this case until

STIPULATION REGARDING STAY AND ~~PROPOSED~~ SCHEDULE FOR CASE
24-CV-09330-TSH

1 after the shutdown of the federal government had ended and appropriations to the Department of Justice
2 were restored — including the October 3, 2025 deadline for ICE to issue a notification to its contractor,
3 GEO, and the deadline for Defendants' rolling productions on or about the 15th of each month — and
4 extending all deadlines in this case for a period of time commensurate with the duration of the lapse in
5 appropriations. *See* ECF No. 31. The stipulation and order further specified that Defendants would
6 promptly notify the Court as soon as the shutdown had ended and, if necessary given the circumstances
7 of the case, confer with opposing counsel and submit within two weeks a joint proposed schedule for the
8 remainder of litigation. *Id.*

9 2. Defendants have conveyed the following to Plaintiff:

10 a. The shutdown ended on November 12, 2025. The duration of the lapse in
11 appropriations — which began at midnight on September 30, 2025 — was
12 approximately 43 days. The Court's order thus served to extend all deadlines by this
13 period of time, including extending ICE's deadline to issue a notification to its
14 contractor, GEO, from October 3, 2025 until November 17, 2025, and extending the
15 deadline for Defendants' next rolling production from October 15, 2025, until
16 November 28, 2025.

17 b. On November 14, 2025, ICE issued the notification to its contractor, GEO, requesting
18 a response by December 15, 2025. In light of the significant impact caused by the
19 shutdown, the holidays, and ICE's notification to GEO on Defendants' processing of
20 records, Defendants have requested a continuance of Defendants' next rolling
21 production by 30 days, from November 28, 2025, until December 29, 2025.

22 3. Plaintiff takes no position with respect to Defendants' representations and does not oppose
23 this Court taking any action it determines appropriate based on Defendants' representations.
24 Notwithstanding the foregoing, Plaintiffs advise this Court of the following procedural
25 history:

26 a. Plaintiffs filed this action on December 23, 2024. ECF No. 1.
27 b. Pursuant to the parties' joint production proposal, which this Court ordered on June 20,
28 2025, Defendants agreed to issue a notification to GEO by August 29, 2025. ECF No.

1 24 ¶ 2.c.

2 c. On August 25, 2025, Defendants requested to extend the GEO notice deadline to
3 September 19, 2025. Plaintiff stipulated to the requested extension on August 29, 2025.
4 ECF No. 26.

5 d. On September 19, 2025, Defendants requested a further extension of the GEO notice
6 deadline until October 17, 2025. After meeting and conferring, Plaintiff stipulated to a
7 brief continuance of the GEO notice deadline until October 3, 2025. ECF No. 28.

8 e. Plaintiff has requested that Defendants not request any further extensions of the
9 December 29, 2025, production deadline or any subsequent production deadlines
10 unless Defendants provide Plaintiff notice of the requested extension at least five (5)
11 court days before the deadline. Plaintiff also reserves the right to refuse any further
12 extension requests absent a showing of good cause by Defendants.

13 4. On November 24, 2025, Defendants requested an extension of the rolling production
14 schedule from November 28, 2025, until December 29, 2025. The parties submitted a stipulation the same
15 day noting that the parties had insufficient time to meet and confer regarding the requested extension. ECF
16 No. 33. The Court ordered the parties to meet and confer on or before November 26, 2025. ECF No. 34.

17 5. The parties stipulate that Defendants' next rolling production be extended by 30 days, from
18 November 28, 2025, until December 29, 2025.

19 6. The parties further stipulate that they will meet and confer on or before December 17,
20 2025, regarding the issue discussed in paragraph 3(e), above, and the schedule for the remainder of the
21 litigation, and that they will submit a joint status report to this Court outlining their respective positions
22 and joint positions on or before December 19, 2025.

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1 IT IS SO STIPULATED.
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DATED: November 24, 2025

Respectfully submitted,

4 CRAIG H. MISSAKIAN
United States Attorney

5 /s/ Savith Iyengar
6 SAVITH IYENGAR
7 Assistant United States Attorney

8 Counsel for Defendants

9 DATED: November 24, 2025

10 Respectfully submitted,

11 **/s/ Brock Seraphin
12 BROCK SERAPHIN

13 Counsel for Plaintiff

14 ** In compliance with Civil Local Rule 5-1(i)(3),
15 the filer of this document attests under penalty
16 of perjury that all signatories have concurred in
17 the filing of this document.

~~[PROPOSED]~~ ORDER

Pursuant to stipulation, IT IS HEREBY ORDERED THAT the deadline for Defendants' next rolling production is continued from October 15, 2025, until December 29, 2025, with subsequent productions being made on a rolling basis on or about the end of each month. The parties will meet and confer on or before December 17, 2025, regarding the issue discussed in paragraph 3(e), above, and the schedule for the remainder of the litigation, and will submit a joint status report to this Court outlining their respective positions and joint positions on or before December 19, 2025.

IT IS SO ORDERED.

DATED: November 25, 2025

HON. THOMAS S. HIXSON
United States Magistrate Judge